

HEATHER E. WILLIAMS, #122664  
Federal Defender  
HANNAH LABAREE, #294338  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: (916) 498-5700  
Fax: (916) 498-5710  
Hannah\_Labaree@fd.org

Attorney for Defendant  
ROBERT CRIST

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-00229-TLN-1
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER TO CONTINUE
vs.	)	STATUS CONFERENCE
	)	
ROBERT CRIST,	)	
	)	Date: January 12, 2023
	)	Time: 9:30 a.m.
Defendant.	)	Court: Hon. Troy L. Nunley
_____	)	

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Assistant United States Attorney Emily Sauvageau, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah Labaree, attorney for Robert Crist, that the status conference, currently scheduled for January 12, 2023, be continued to March 2, 2023, at 9:30 a.m.

To date, the government has produced approximately 228 Bates-stamped items in discovery. Defense counsel requires additional time to review the discovery, meet with her client, and conduct independent investigation. Further, the parties are in discussion about possible resolution of the case. The parties thus request a T4 exclusion of time until March 2, 2023.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from this order's date through and including March 2, 2023; pursuant to 18 U.S.C.

§3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

Dated: January 5, 2023

HEATHER E. WILLIAMS  
Federal Defender

/s/ Hannah Labaree  
HANNAH LABAREE  
Assistant Federal Defender  
Attorney for Defendant  
ROBERT CRIST

Dated: January 5, 2023

PHILLIP A. TALBERT  
United States Attorney

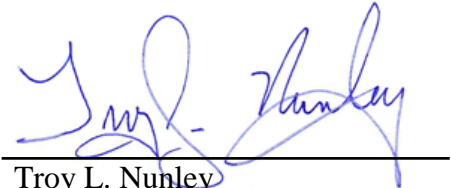
/s/ Emily Sauvageau  
EMILY SAUVAGEAU  
Assistant U.S. Attorney  
Attorney for Plaintiff

**ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including March 2, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the January 12, 2023 status conference shall be continued until March 2, 2023, at 9:30 a.m.

Dated: January 5, 2023

  
Troy L. Nunley  
United States District Judge